

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LLC, FTX
TRADING LTD., WEST REALM SHIRES,
INC., AND WEST REALM SHIRES
SERVICES INC. (D/B/A FTX.US),

Plaintiffs,

v.

DANIEL FRIEDBERG,

Defendant.

Adv. Pro. No. 23-50419 (JTD)

Adv. Ref. Nos. 1, 6, 7 & 8

CERTIFICATION OF COUNSEL

I, Matthew B. McGuire, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On June 27, 2023, Plaintiffs Alameda Research LLC, FTX Trading Ltd., West Realm Shires, Inc., and West Realm Shires Services Inc. (d/b/a FTX.US) (the “Plaintiffs”) initiated the above-captioned adversary proceeding by filing the Complaint [Adv. D.I. 1] (the “Complaint”)

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

against Defendant Daniel Friedberg (the “Defendant” and, together with the Plaintiffs, the “Parties”).

2. On July 7, 2023, the Defendant executed a *Waiver of the Service of Summons* [Adv. D.I. 6], agreeing to accept and waive his objections, if any, to service of process. The Defendant’s deadline to respond to the Complaint was September 15, 2023.

3. On July 26, 2023, the Plaintiffs filed the *Notice of Pretrial Conference* [Adv. D.I. 7], noticing a pretrial conference (the “Pretrial Conference”) for October 4, 2023 at 1:00 p.m. (ET), pursuant to rule 7004-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware.

4. On September 22, 2023, FTX Trading Ltd. and its affiliated debtors and debtors-in-possession filed the *Notice of Rescheduled Hearing Date* in the main chapter 11 proceedings [D.I. 2680], rescheduling the Pretrial Conference to October 19, 2023 at 10:00 a.m. (ET).

5. On September 27, 2023, the Plaintiffs filed the *Stipulation for an Extension of Time for Defendant to Respond to Complaint* [Ad. D.I. 8], extending the Defendant's deadline to respond to the Complaint to October 4, 2023.

6. The Parties have conferred and agree that the deadline for the Defendant to respond to the Complaint shall be further extended through and including October 20, 2023 and the date of the Pretrial Conference shall be adjourned to November 15, 2023 at 1:00 p.m. (ET).

7. The Parties’ stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is annexed hereto as **Exhibit 1** (the “Order”).

8. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: October 4, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

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